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October 27, 2020

VIA ECF (with courtesy copy to: Torres\_NYSDChambers@nysd.uscourts.gov)

Hon. Analisa Torres  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
Courtroom 15D  
New York, NY 10007-1312

Re: Casa Express Corp, as Trustee of Casa Express Trust v. Bolivarian Republic  
of Venezuela; 18-cv-11940 (AT) [rel. 19-cv-3123 & 19-cv-11018]

Dear Judge Torres:

This firm represents the plaintiff, Casa Express Corp, as trustee of Casa Express Trust ("Casa Express"), in the above-referenced action. By Order dated September 30, 2020, the Court directed Casa Express to submit a motion for attorney's fees on or before October 30, 2020. ECF No. 75 at 15. Since that time, Casa Express and the defendant, the Bolivarian Republic of Venezuela ("Venezuela"), through counsel, have been in active and productive discussions of a potential consensual resolution of Casa Express' attorney's fees claim. Those discussions, however, have not yet concluded. Accordingly, to allow the parties to continue their efforts to reach a consensual resolution of Casa Express' attorney's fees claim, and thereby obviate any further litigation in this case, Casa Express respectfully requests that the Court extend the deadline for filing its attorney's fees motion by three weeks, to November 20, 2020. The parties have made no previous extension requests. Venezuela consents to this request.

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Respectfully submitted,

/s/ Jeremy Wallison

cc (by ECF): counsel of record